



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP - 3 2015

Ellen Carlson
Fire Island National Seashore GMP
15 State Street
Boston, MA 02109

Dear Ms. Carlson:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Fire Island National Seashore General Management Plan (CEQ # 20150170) in accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act.

Fire Island National Seashore (the Seashore) is a unit of the National Park System located along the south shore of Long Island in Suffolk County, New York. The Seashore comprises two separate and distinct areas, separated by the Great South Bay:

- The barrier island, consisting of 19,580 acres of upland, tidal, and submerged lands along a 26-mile stretch of the 32-mile island. This includes 1,400 acres of federally designated wilderness, an extensive dune system, maritime forests, isolated beaches, and the Fire Island Lighthouse.
- The William Floyd Estate (the Estate) on the south shore of Long Island. The 613-acre Estate is composed of 27 buildings, structures, and major landscape features.

The National Park Service (NPS) is proposing to implement a General Management Plan (GMP) for the Seashore. The GMP is a comprehensive document that defines the park's purpose and management direction and provides guidance for all subsequent planning and management decisions over the next 15 to 25 years. The GMP addresses issues related to climate change and sea-level rise, land use and development, shoreline management, and the needs for public access and recreational use that are affecting the Seashore's resource management practices.

NPS has selected Management Alternative 3, in combination with Management Alternative B as described for the William Floyd Estate, as the preferred alternative for the GMP. Under Management Alternative 3 for the barrier island, existing infrastructure would be retained and, over time, improved and/or reoriented to be greener, more efficient, and better adapted to the coastal environment. Any new development would be limited to existing visitor use areas and undertaken only after appropriate climate change and sea-level rise assessments. The Seashore would work to restore the Sunken Forest and other maritime forests on Fire Island, improve water quality through the development and implementation of a wastewater management plan,

and engage in more intensive management of non-native invasive species. Specific activities include redesign of the Sailors Haven marina to minimize the erosion that has been undermining the Sunken Forest and rehabilitation of the Wilderness Visitor Center to improve accessibility.

Under Management Alternative B for the William Floyd Estate, NPS would correct structural issues at the main structure of the park, Old Mastic House, and remove the orientation exhibit and sales area. The visitor center and selected structures and landscape features (e.g., garden, portions of the orchard) within the historic core would be rehabilitated. The NPS would prepare a Cultural Landscape Report (CLR) and Treatment Plan for the Estate, which will govern rehabilitation of existing cultural landscape feature and the creation of new landscape vignettes (e.g., cultivated fields) to evoke different periods in the Estate's history. Existing roads and trails will be rehabilitated and the existing curatorial building will be expanded by 1000 ft² to allow the NPS to consolidate maintenance operations within a single structure at the Estate.

Based on our review and in accordance with EPA policy, we have rated this draft EIS as EC-2, indicating that the draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. NPS should provide in the final EIS supplemental information on planned restoration, rehabilitation, and construction projects at the Seashore that includes, at a minimum:

- Identification of specific locations where activities will occur,
- Descriptions of natural resources at locations potentially adversely impacted by the activities,
- Best management practices that will be used to avoid, or mitigation measures to address, adverse impacts of activities,
- Descriptions of methods, materials, and equipment that will be used, and
- Construction diagrams, landscape plans, or other visual representations of planned projects.

The GMP provides direction and guidance for park planning and management decisions over a long period of time, 15 to 25 years. We understand that specifics for projects may not be available at this time, but we would expect NPS to prepare supplemental NEPA documents as each action moves forward. These documents should include the impacts of construction, including an analysis of air emissions. Thank you for the opportunity to comment on this project. If you have any questions, please contact Shane Nelson at (212) 637-3130.

Sincerely,



Judy Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch